

EXHIBIT E

NO. D-1-GN-16-001595

SARAH SOISSON, Plaintiff, v. NUANCE COMMUNICATIONS, INC., Defendant.	§ § § § § § § § §	IN THE DISTRICT COURT OF TRAVIS COUNTY, TEXAS 345TH JUDICIAL DISTRICT
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**DEFENDANT NUANCE COMMUNICATIONS, INC.'S ANSWER,
AFFIRMATIVE DEFENSES, AND SPECIAL EXCEPTIONS**

Defendant Nuance Communications, Inc. ("Nuance") files this Answer, Affirmative Defenses, and Special Exceptions to Plaintiff's Original Petition ("Petition") and states as follows:

I. GENERAL DENIAL

Defendant generally denies all of the allegations contained in Plaintiff's Original Petition and demands strict proof thereof by a preponderance of the evidence.

II. AFFIRMATIVE DEFENSES

Subject to and without waiving the foregoing general denial, and without waiving Plaintiff's burden to show otherwise, Defendant pleads as follows:¹

1. Plaintiff fails to state a claim or cause of action upon which relief can be granted.
2. Plaintiff's claims are barred, in whole or in part, by the applicable statute of limitations.
3. Defendant based all employment actions regarding Plaintiff on specific job-related factors, consistent with business necessity, and for legitimate, lawful reasons.

¹ To the extent that any defenses or legal theories asserted herein may be interpreted as being inconsistent, such defenses or legal theories are hereby pled in the alternative.

4. Plaintiff's employment was at-will at all times she was employed by Defendant.
5. Plaintiff's claims are barred, in whole or in part, by the statute of frauds.
6. Plaintiff's alleged report was made in bad faith and/or without genuine concern.

III. SPECIAL EXCEPTIONS

Defendant specially excepts to Plaintiff's Petition under Texas Rule of Civil Procedure 47 because Plaintiff fails to allege the maximum amount of damages that Plaintiff seeks to recover.

IV. RESERVATION OF RIGHTS

Defendant reserves the right to file such amended answers and defenses as may become appropriate.

V. MOTION TO DISMISS

Defendant requests that the Court sustain its special exceptions and order Plaintiff to file, within ten days of entry of the Court's order, an amended petition that cures the above deficiencies, and if Plaintiff fails or refuses to amend, that this action be dismissed.

VI. PRAYER

Defendant prays that upon a final hearing hereof that judgment be entered on behalf of Defendant, that Plaintiff takes nothing by virtue of this action, and that Defendant be granted such other and further relief, including costs of court and attorneys' fees, at law or in equity, to which it may be justly entitled.

Dated: April 26, 2016

Respectfully submitted,

/s/ Earl M. (Chip) Jones, III

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ATTORNEYS FOR DEFENDANT
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was forwarded to the undersigned via CM, RRR and ECF notification on April 26, 2016 as follows:

Mark G. Lazarz
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Houston, TX 77046

/s/ Earl M. (Chip) Jones, III
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